1	WILLIAM B. TERRY, ESQ. Nevada Bar No. 001028				
2	WILLIAM B. TERRY, CHARTERED 530 South Seventh Street				
3	Las Vegas, Nevada 89101				
4	(702) 385-0799 (702) 385-9788 (Fax)				
5	<u>Info@WilliamTerryLaw.com</u> Attorney for Defendant				
6	PAUL LOISEL				
7	UNITED STATES DISTRICT COURT				
	DISTRICT OF NEVADA				
8	UNITED STATES OF AMERICA,				
-	Plaintiff, CASE NO. 2:16-cr-00058-APG-PAL				
10	vs.				
11	PAUL LOISEL,				
12	) Defendant. )				
13					
14	STIPULATION TO CONTINUE MOTION DEADLINES				
15	(Second Request)				
16	IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden				
17	United States Attorney, and Phillip Smith, Esq., Assistant United States Attorney, counsel for the				
18	United States of America, and William B. Terry, Esq., of the law offices of William B. Terry  Chartered, counsel for the Defendant, Paul Loisel, and Nicholas Wooldridge, Esq., co-counsel for				
19					
	defendant, Paul Loisel, as follows:				
	IT IS HEREBY STIPULATED AND AGREED, that counsel for the defense shall have up to and including May 27, 2016, within which to file any motions;				
22	IT IS FURTHER STIPULATED AND AGREED, by and between the parties herein, that				
23	the Government shall have up to and including June 10, 2016, to file any responses;				
24	IT IS FURTHER STIPULATED AND AGREED, by and between the parties herein, that				
25	the counsel for the defense shall have up to and including June 17, 2016, to file any replies;				
26	This stipulation is entered into based on the following reasons:				
27	1. Counsel for the defense is in the process of still reviewing all the discovery in this				
28	matter;				

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1 2	2.	The parties have not been able to come to a resolution and this matter may proceed to trial;					
3	3.	Counsel for the defe	endant has spoke	en to the defendar	nt and the defendant has no		
4		objection to the requ	uested continuanc	ee;			
5	4.	Counsel for the def	fendant have spo	ken to counsel for	or the Plaintiff who has no		
6		objection to the requ	uested continuanc	ee;			
7	5.	5. Denial of this request for continuance would result in a miscarriage of justice;					
8	5.	For all of the above	e-stated reasons,	the ends of justice	e would be best served by a		
9		continuance of the tr	rial date;				
10	6.	The additional time r	requested by this s	tipulation, is exclu	udable in computing the time		
11		within which the tria	al herein must co	mmence pursuant	to the Speedy Trial Act, 18		
12		U.S.C. §3161(h)(8)(	(A), considering	the factors under	18 U.S.C. §3161(h)(8)(B)(I)		
13		and (iv); and					
14	7.	There has been one	prior requests for	a continuance of	the motion deadlines in this		
15		case.					
16	DATED this 22 <sup>nd</sup> day of April, 2016.						
17							
18	/s/ Phillip S	mith	<u> </u>	/s/ William Te	rry PRV ESO		
19	PHILLIP N. SMITH, JR., ESQ. Assistant United States Attorney Nevada Bar No. 010233 501 Las Vegas Boulevard, #1100 Las Vegas, Nevada 89101			WILLIAM B. TERRY, ESQ. Nevada Bar No. 001028 530 South Seventh Street			
20				Las Vegas, Nevada 89101 (702) 385-0799			
21	(702) 388-633 Attorney for P	66		Attorney for Paul Loisel			
22	7 tttorney for f	Tantin					
23				/s/ Nicholas W	ooldridge OLDRIDGE, ESQ.		
24				Nevada Bar No. 520 South Fourth	008732		
25				Las Vegas, Neva (702) 885-3991			
26				Attorney for Paul	Loisel		
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1									
2	UNITED STATES DISTRICT COURT								
3	DISTRICT OF NEVADA								
4			DISTRICT OF	INE VINDIN					
5	UNITED STATES OF AMERICA,								
6		Plaintiff,		CASE NO.	2:16-cr-00058	3-APG-PAL			
7	vs.								
8	PAUL LOISI	EL,							
9		Defendant.	{						
10			 FINDINGS O	F FACT					
11	Based	I upon the pending stip			d cause annearii	ng therefore the			
12	Court finds the		paration of the pe	arries, and 500	a cause appearin	ng mererore, me			
13	1.	Counsel for the defer	nse is in the proce	ess of reviewin	g all the discove	ry in this matter:			
14	2.	The parties have not	_						
15		to trial;				recomp process			
16	3.	Counsel for the defe	endant has spok	en to the defe	ndant and the d	efendant has no			
17		objection to the requ	-			• • • • • • • • • • • • • • • • • • • •			
18	4.	Counsel for the def			sel for the Plain	tiff who has no			
19	·	objection to the requ	•						
20	5.	There have been no			e of the motion	deadlines in this			
21		case.	1						
22			CONCLUSION	S OF LAW					
23	1.	Denial of this reques			in a miscarriage	e of justice;			
24	2.	For all of the above			Č	•			
25		continuance of the tr	rial date;			·			
26	3.	The additional time r	requested by this	stipulation, is e	excludable in cor	nputing the time			
27		within which the tria	_	_					
28		U.S.C. §3161(h)(8)(		-	•				
		and (iv); and			v				
	I								

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1	<u>ORDER</u>
2	IT IS THEREFORE ORDERED that counsel for the defense shall have up to and including
3	May 27, 2016, within which to file any motions;
4	IT IS FURTHER ORDERED by and between the parties herein, that the Government shall
5	have up to and including June 10, 2016, to file any responses;
6	IT IS FURTHER ORDERED by and between the parties herein, that the counsel for the
7	defense shall have up to and including June 17, 2016, to file any replies.
8	DATED this <u>25th</u> day of April, 2016.
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10	UNITED STATES DISTRICT JUDGE
11	GIATED STATES DISTINCT VODGE
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